Dallas W. Jolley 1 Attorney at Law 4707 South Junett St., Suite B Tacoma, WA 98409 2 Office (253) 761-8970 Fax: (253) 761-7910 3 4 5 6 7 8 CHRISTINE L. CORY, 9 **Debtors** 10 11 12 13 14 15 16 17 18 19 20 21 22 23

The Honorable Judge Lynch Chapter 13

UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF WASHINGTON

In re:

Case No.: 12-47888

DENNIS M CORY, JR. and CHAPTER 13

SUPPLEMENTAL
DECLARATION OF DEBTORS IN SUPPORT
OF MOTION MODIFY CHAPTER 13 PLAN

WE, Dennis and Christine Cory, the Debtors in the above captioned chapter 13 proceeding declare the following to be true and correct under the penalties of perjury of the State of Washington and we Submit this Supplemental Declaration in Support of the Motion to Modify Chapter 13 Plan and to request the Court approve the Motion to Modify and Modified Chapter 13 Plan filed February 6, 2015.

- We submit this supplemental declaration in support of the Motion to Modify Chapter 13 plan, and in support of the modified plan filed February 6, 2015 which should address the concerns of the chapter 13 trustee.
- We also submit this Supplemental declaration in support of the Motion to Approve
 Modification to address the concerns of the secured creditor's objection to motion to modify.

SUPPLEMENTAL DECLARATION OF DEBTORS IN SUPPORT OF MOTION TO MODIFY CHAPTER 13 PLAN PAGE 1 of 3

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- 3. We have made arrangements with the Chapter 13 Trustee to have the total trustee payments directly withheld from Denis Michael Corry's pay going forward. This will ensure that the plan is fully funded and that payments are timely and complete.
- 4. Additionally we have made a direct payment to the trustee in January 2015 in the amount of \$3,412.81. Any other arrears or shortages will be address through the modified chapter 13 plan, which continues to pay the secured and unsecured creditors in full over the remaining life of the plan.
- 5. I, Dennis M. Cory, receive commissions from my employer. The commissions are not guaranteed, but they have frequently been close to a \$1,000 per month. My company was just awarded a large project that will provide me with additional monthly commissions over the next four years. I have reviewed the project and I plan to receive an average of \$700 dollars in additional commission per month for the duration of the project.

 This additional income provides assurances that we will have the necessary funds to fund this chapter 13 plan.
- 6. I, Dennis M. Corry also receive a vehicle cost reimbursement that assists with costs and expenses.
- 7. I, Christine L. Cory, am actively in the process of obtaining employment. Previously I was working for RFI Communications & Security Systems for seven plus years as a Service administrator. I believe these skills are transferable and I will continually seek employment. In the interim we will tighten our budget accordingly.

SUPPLEMENTAL DECLARATION OF DEBTORS IN SUPPORT OF MOTION TO MODIFY CHAPTER 13 PLAN PAGE 2 of 3

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	8. With the direct withholdings of the trustee payment we will be consistently making our
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2	payments and we assert that the modified plan and motion to approve modified plan are
3	in our best interest and that we will be successful with our chapter 13 plan going forward.
4	Dated this 6th Day of February 2015 in Pierce, County Washington.
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6	/s/ Dennis Cory Dennis Cory, Debtor
7 8	Christine Cory Christine Cory, Debtor
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	SUPPLEMENTAL DECLARATION OF DEBTORS Dallas W. Jolley, Attorney at Law

SUPPLEMENTAL DECLARATION OF DEBTORS IN SUPPORT OF MOTION TO MODIFY CHAPTER 13 PLAN PAGE 3 of 3

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